

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Matthew Fairbanks, Jason Damman, Colin  
Beere, John Quarnstrom, Casey Meinhardt  
and Andrew Graham, or any successors as  
Trustees of the Sheet Metal Local #10  
Control Board Trust Fund, and the Sheet  
Metal Local #10 Control Board Trust Fund,

Civil File No. 0:25-cv-00815

**ANSWER**

Plaintiffs,

vs.

M. J. O'CONNOR, INC.

Defendant.

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Defendant, as its Answer to the Complaint, states and alleges as follows:

1. Defendant admits Paragraph 1.
2. Defendant admits Paragraph 2.
3. Defendant admits Paragraph 3.
4. Defendant admits Paragraph 4.
5. Defendant admits Paragraph 5.
6. Defendant admits Paragraph 6.
7. Paragraph 7 requires neither an admission nor a denial.
8. Defendant admits Paragraph 8.
9. Defendant denies Paragraph 9.
10. Defendant admits Paragraph 10.

11. Defendant denies Paragraph 11 for lack of information, having not seen the documents referenced.
12. Defendant admits Paragraph 12.
13. Defendant admits Paragraph 13.
14. Defendant admits Paragraph 14.
15. Defendant admits Paragraph 15.
16. Defendant admits Paragraph 16.
17. Defendant admits Paragraph 17.
18. Defendant admits Paragraph 18.
19. Paragraph 19 requires neither an admission nor a denial.
20. Defendant admits Paragraph 20.
21. Defendant admits Paragraph 21.
22. Defendant admits Paragraph 22.
23. Defendant admits Paragraph 23.
24. Defendant admits Paragraph 24.
25. Defendant denies Paragraph 25.
26. Defendant denies Paragraph 26.
27. Defendant denies Paragraph 27.
28. Defendant denies Paragraph 28 in that any such fees and costs must be reasonable, and must be necessary for the prosecution of this action.
29. Defendant admits Paragraph 29.
30. Paragraph 30 requires neither an admission nor a denial.
31. Defendant denies Paragraph 31.
32. Defendant admits Paragraph 32.
33. Defendant admits Paragraph 33.

**AFFIRMATIVE DEFENSES**

1. Plaintiff has failed to state a claim upon which relief can be granted.
2. Any attorney fees, litigation costs, or interest awarded must be reasonable.

Respectfully submitted,

HOVERSTEN, JOHNSON, BECKMANN  
& HOVEY, LLP

DATED: March 27, 2025

By /s/ **Marty G. Helle**  
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